

REMARKS

Applicants thank Examiner Ahmed for his courteous and congenial telephone interview with Applicants' representative on November 21, 2005.

Claims 1-8 are pending in the present application.

Claims 9-20 are canceled.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments: a) place the application in condition for allowance (for the reasons discussed herein); b) do not raise any new issues requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout the prosecution); and c) place the application in better form for appeal, should an appeal be necessary. As pointed out in the telephone interview and as discussed below U.S. 3,137,600 to Margulies et al. teach away from an etching composition including sodium monopersulfate, potassium monopersulfate, or mixtures thereof. This issue was addressed in response to the Office Action mailed April 27, 2005.

Claims 1, 3-4 and 7 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. patent application publication No. 2002/0000382 to Morrissey et al. Applicants respectfully traverse this rejection.

Morrissey et al. do not teach or suggest a composition comprising a persulfate of sodium monopersulfate, potassium monopersulfate, or mixtures thereof, a fluorine containing acid, and boric acid or a salt of a boric acid or mixtures thereof as recited in present claim 1. Since claims 3, 4 and 7 depend from claim 1, they also are not anticipated by Morrissey et al.

Applicants respectfully request withdrawal of rejection of claims 1, 3-4 and 7 under 35 U.S.C. §102(e) as allegedly anticipated by U.S. patent application publication No. 2002/0000382 to Morrissey et al.

Claims 1, 3 and 5-7 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 6,444,140 to Schmenaur et al. in view of U.S. 4,256,602 to McLaughlin, Jr. Applicants respectfully traverse this rejection.

Schmenaur et al. alone or in combination with McLaughlin et al. do not teach or suggest a composition comprising a persulfate of sodium monopersulfate, potassium monopersulfate, or mixtures thereof, a fluorine containing acid, and boric acid or a salt of boric acid or mixtures

thereof as recited in claim 1. Both documents are totally silent on sodium monopersulfate, potassium monopersulfate or mixtures thereof.

Applicants respectfully request withdrawal of the rejection of claims 1, 3 and 5-7 under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 6,444,140 to Schemenaur et al. in view of U.S. 4,256,602 to McLaughlin, Jr.

Claim 2 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 6,444,140 to Schemenaur et al. in view of U.S. 4,256,602 to McLaughlin, Jr. as applied to claims 1, 3 and 5-7, and further in view of U.S. 3,137,600 to Margulies et al.

Claim 2 is canceled. Accordingly, this rejection is moot.

Claim 8 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 6,444,140 to Schemenaur et al. in view of U.S. 4,256,602 to McLaughlin, Jr and U.S. 3,137,600 to Margulies et al. as applied to claim 2, and further in view of U.S. 5,669,980 to McNeil et al. Applicants respectfully traverse this rejection.

As pointed out in the telephone interview, Margulies et al. do not teach or suggest an etch composition containing potassium monopersulfate. Margulies specifically state that potassium monopersulfate is largely ineffective in dissolving copper (col. 2, lines 47-54). Margulies specifically teach using ammonium monopersulfate. Margulies et al. teach away from using potassium monopersulfate. Accordingly, a person of skill in the art would not have been motivated to used potassium monopersulfate.

Further, Schemenaur et al. and McLaughlin, Jr. are not properly combinable. Schemenaur et al. are directed to micro-etching using molybdenum ions and azole compounds to oxidize metals to form a roughened metal surface (col. 1, lines 12-18 and col. 2, lines 31-36). In contrast, McLaughlin, Jr. is directed to cleaning aluminum fines and liquid oils from the interior and exterior of aluminum used in making containers using fluoroborate complexes (col. 1, lines 18-21 and lines 59-68, and col. 2, lines 19-23). Moreover, McLaughlin, Jr. uses low concentrations of fluoride to prevent undesired etching (col. 1, lines 50-57 and col. 2, lines 34-38 and lines 46-50). McLaughlin, Jr. is cleaning an aluminum surface, not micro-etching as Schemenaur et al. Each is directed to a different type of process and a different purpose. Accordingly, a person of skill in the art would not have had any reason or motivation to use

fluoroborate complexes to micro-etch, i.e. oxidize, metal surfaces based on the teachings of McLaughlin, Jr.

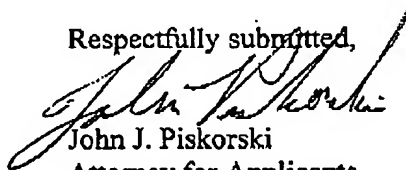
McNeil et al. do not make up for any of the deficiencies of Schemenaur et al., McLaughlin, Jr. and Margulies et al. McNeil et al. desire to clean aluminum by removal of silicon metals and oxides (col. 1, lines 6-10 and col. 2, lines 25-28). McNeil et al. use fluoride ions to remove silicon, metals and oxides from the surfaces of an aluminum-silicon alloy (col. 6, line 65 to col. 7, line 2). No where do McNeil et al. use fluoride to micro-etch as Schemenaur et al. do. Schemenaur et al. desire to form oxides on a metal surface (col. 2, lines 65-66, col. 3, lines 15-24 and Fig. 2), not remove oxides. McNeil et al. teach the opposite of what Schemenaur et al. teach. Accordingly, a person of skill in the art would not have had any reason or motivation to include hydrofluoric acid and fluoroboric acid in the Schemenaur et al. formulation based on the teachings of McNeil et al.

Applicants respectfully request withdrawal of the rejection of claim 8 under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 6,444,140 to Schemenaur et al. in view of U.S. 4,256,602 to McLaughlin, Jr. and U.S. 3,137,600 to Margulies et al. and further in view of U.S. 5,669,980 to McNeil et al.

Favorable consideration and allowance of claims 1-8 are earnestly solicited.

Should the Examiner have any questions concerning this response or this application, or should he believe this application is for any reason not yet in condition for allowance, he is respectfully requested to telephone the undersigned at the number set forth below to expedite allowance of this application.

Respectfully submitted,



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